

Ashley M. Simonsen (State Bar. No. 275203)  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: + 1 (424) 332-4800  
Facsimile: +1 (650) 632-4800  
Email: asimonsen@cov.com

*Attorneys for Defendants Meta Platforms, Inc.;  
Instagram, LLC; Meta Payments, Inc.; and Meta  
Platforms Technologies, LLC*

*Additional parties and counsel listed on signature  
page*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

*People of the State of California, et al. v. Meta  
Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

**META AND CALIFORNIA GO-BIZ'S  
STIPULATION AND [PROPOSED]  
ORDER EXTENDING DEADLINE TO  
BRIEF DISCOVERY DISPUTES**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-2 and 7-12, the California Governor’s Office of Business and Economic Development (“California GO-Biz”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together with California Go-Biz, the “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. Meta has requested that California GO-Biz produce certain documents, and discussions about that request remain ongoing.

2. On February 13, 2025 (ECF 1696), the Court set certain stipulated discovery deadlines that applied to state agency discovery, including a March 14, 2025 deadline to “substantially complete production of all” agency documents and to “finalize, and, if necessary, brief, all disputes about the scope of the State AGs’ and state agencies’ responses and objections to Meta’s existing RFPs.” *See* ECF 1696.

3. In light of the Parties’ ongoing efforts to reach agreement about California GO-Biz’s responses to Meta’s request for production, the Parties agree, subject to Court approval, to set a different deadline of April 14, 2025 for California GO-Biz to substantially complete production of documents and to finalize, and if necessary, brief any disputes about the scope of California GO-Biz’s responses and objections to Meta’s request for documents from California GO-Biz.

4. The deadlines set forth in this stipulation will not automatically affect other deadlines in the case schedule, but they may or may not require future requests by the Parties and future action by the District Court on other deadlines in the case schedule. The Parties reserve all rights with respect to other changes to deadlines.

5. Therefore, the Parties agree, subject to the Court’s approval, that the deadline for California GO-Biz to substantially complete production of documents, and for the Parties to finalize, and, if necessary, brief, all disputes about the scope of the California GO-Biz’s responses and objections to Meta’s request for production shall be **April 14, 2025**.

**IT IS SO STIPULATED AND AGREED.**

Respectfully submitted,

DATED: March 14, 2025

By: /s/ Margaret R. Prinzing

**OLSON REMCHO, LLP**

Margaret R. Prinzing (CA SBN 209482)  
Olson Remcho, LLP  
1901 Harrison Street, Suite 1550  
Oakland, CA 94612  
Phone: (510) 346-6200  
Fax: (510) 574-7061  
Email: mprinzing@olsonremcho.com

*Attorneys for Non-Party the Governor's Office of  
Business and Economic Development*

By: /s/ Ashley M. Simonsen

**COVINGTON & BURLING LLP**

Ashley M. Simonsen, SBN 275203  
COVINGTON & BURLING LLP  
1999 Avenue of the Stars  
Los Angeles, CA 90067  
Telephone: (424) 332-4800  
Facsimile: + 1 (424) 332-4749  
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*  
Paul W. Schmidt, *pro hac vice*  
COVINGTON & BURLING LLP  
One City Center  
850 Tenth Street, NW  
Washington, DC 20001-4956  
Telephone: + 1 (202) 662-6000  
Facsimile: + 1 (202) 662-6291  
Email: pajones@cov.com

*Attorneys for Defendants Meta Platforms, Inc.;  
Instagram, LLC; Meta Payments, Inc.; and Meta  
Platforms Technologies, LLC*

**SIGNATURE CERTIFICATION**

Under Civ. L.R. 5-1(h)(3), I, Ashley M. Simonsen, hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: March 14, 2025

/s/ Ashley M. Simonsen

Ashley M. Simonsen

*Counsel for Meta Platforms, Inc.; Instagram, LLC;  
Meta Payments, Inc.; and Meta Platforms  
Technologies, LLC*

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**  
2

3  
4 DATED:

5 PETER H. KANG  
6 UNITED STATES MAGISTRATE JUDGE  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28